

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**HARRISON COMPANY, L.L.C,**

**Plaintiff,**

**v.**

**A-Z WHOLESALERS INC. and  
BARKAT G. ALI,**

**Defendants.**

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**CIVIL ACTION NO. 3:19-CV-1057-B**

**PLAINTIFF'S FIRST AMENDED EXHIBIT LIST**

**EXHIBITS**

Pursuant to Local Rule 26.2 and the Court's Scheduling Order (ECF No. 9), Plaintiff Harrison Company, L.L.C. ("Harrison") may produce the exhibits listed in this document at trial. Harrison reserves the right to designate rebuttal exhibits, if necessary, based on Defendants' case-in-chief and for purposes of cross-examination. This is a preliminary list, and Harrison reserves the right to amend this list and to de-designate exhibits prior to trial.

Ex. #	Description	Offered	Objection	Admitted/Not Admitted	Disposition
P-1	Credit Application, Credit Agreement & Guaranty, dated March 11, 2011 [Bates-Stamped HAR000157-159]				
P-2	4/10/14 Email from Wayne Baquet to customers [Bates-Stamped AZ000850]				
P-3	Article of Amendment to Article of Organization of Harrison Company, L.L.C., dated June 30, 2008 [ECF 63, pp. 6-7]				
P-4	Certificate of Merger of Noble Feldman, LLC and Imperial Trading Co., L.L.C., dated September 1, 2014				

	[Bates-Stamped HAR000620-624]				
P-5	Organizational Chart Prior to September 1, 2014 [Bates-Stamped HAR006055]				
P-6	10/31/14 Email with attached letter from Wayne Baquet to customers [Bates-Stamped AZ005029-5030]				
P-7	Current Organizational Chart [Bates-Stamped HAR006173]				
P-8	Demand letter from Plaintiff's counsel to Defendants' counsel, dated May 2, 2019 [Bates-Stamped HAR000609-619]				
P-9	11/24/14 Email from Barkat [Bates-Stamped HAR005700-5701]				
P-10	12/22/14 Email from Barkat [Bates-Stamped HAR005748]				
P-11	2/27/2015 Email from Amar to Barkat, with attachment [Bates-Stamped AZ000139-140]				
P-12	3/5/15 Email from Brad A. [Bates-Stamped AZ006295]				
P-13	3/6/15 Email from Brad A., with attachment [Bates-Stamped AZ006298-6299]				
P-14	2/27/15 Email from Brad A., with attachment [Bates-Stamped AZ006300-6301]				
P-15	3/13/15 Email from Brad A., with attachment [Bates-Stamped AZ001382-83]				
P-16	3/26/15 Email from Brad A. [Bates-Stamped AZ001403]				
P-17	3/29/15 Email from Brad A., with attachment [Bates-Stamped AZ002498-99]				
P-18	4/20/15 Email from Brad A., with attachment [Bates-Stamped AZ002515-16]				
P-19	3/14/15 Email from Rafiq [Bates-Stamped AZ006443-6444]				
P-20	8/23/17 Email from Rafiq [Bates-Stamped AZ008031-8033]				
P-21	10/30/15 Email from Brad P., with attachment [Bates-Stamped AZ006668-69]				

P-22	6/15/18 Letter re: balance for auditor [Bates-Stamped HAR005865-5868]				
P-23	3/15/19 Email from Sandy Z., with attachment [Bates-Stamped AZ010031]				
P-24	Dan Burgos W-2s (2018-2020) [Bates-Stamped HAR006167-68]				
P-25	Chris McClure W-2s (2018-2020) [Bates-Stamped HAR006169-70]				
P-26	Scott Faley W-2s (2018-2020) [Bates-Stamped HAR006171-72]				
P-27	Pictures of Harrison Trucks [Bates-Stamped HAR006111-15]				
P-28	Harrison truck rentals (Ryder) [Bates-Stamped HAR006009-6027]				
P-29	Harrison truck rentals (Penske) [Bates-Stamped HAR005966-6008]				
P-30	2/2015 Harrison Ferrara Candy Vendor Invoices/Payments [Bates-Stamped HAR005958-5963]				
P-31	11/2015 Imperial Ferrara Candy Vendor Invoices/Payments [Bates-Stamped HAR006033-6046]				
P-32	11/2015 Harrison Ferrara Candy Vendor Invoices/Payments [Bates-Stamped HAR005952-5957]				
P-33	11/2018 Imperial Ferrara Candy Vendor Invoices/Payments [Bates-Stamped HAR006028-6032]				
P-34	10/2018 Harrison Ferrara Candy Vendor Invoice [Bates-Stamped HAR005945-5951]				
P-35	Intercompany Documentation [Bates-Stamped HAR005869-5874]				
P-36	10/15/18 Invoice [Bates-Stamped HAR006066-6069]				
P-37	10/15/18 Manifest [Bates-Stamped HAR006070]				
P-38	10/15/18 A/R Daily Invoice Recap [Bates-Stamped HAR006071-6074]				
P-39	10/15/18 General Ledger Display Detail [Bates-Stamped HAR006075-6077]				
P-40	2/28/19 A/R Daily Invoice Recap [Bates-Stamped HAR006078-6109]				

P-41	2/28/19 General Ledger Display Detail, [Bates-Stamped HAR006110]				
P-42	5/31/18 A-Z Aged Trial Balance				
P-43	5/31/18 Aged Trial Balance [Bates-Stamped HAR003707-3911]				
P-44	5/31/19 Aged Trial Balance [Bates-Stamped HAR003917-4122]				
P-45	5/29/20 Aged Trial Balance [Bates-Stamped HAR004123-4315]				
P-46	A-Z Transaction Detail, 6/1/18 through 5/31/19 [ECF 53, at pp. 51-72]				
P-47	Accounting Summary [Bates-Stamped HAR003916]				
P-48	Travelers Verification Certificate (Harrison) [Bates-Stamped HAR006047-6049]				
P-49	11/2020 Harrison Electric Bill [Bates-Stamped HAR005964-5965]				
P-50	Harrison Multiple Indebtedness Mortgage [Bates-Stamped HAR005929-5944]				
P-51	Promissory Note in Harrison's name, signed by Imperial as sole member of Harrison [Bates-Stamped HAR006063-6064]				
P-52	Harrison Acknowledgment of Multiple Indebtedness Mortgage [Bates-Stamped HAR005927-5928]				
P-53	Harrison Pledge of Leases and Rents [Bates-Stamped HAR006050-6062]				
P-54	Imperial Trading Co. LLC Certificate of Liability Insurance (naming Harrison Company, L.L.C. as additional insured) [Bates-Stamped HAR005875-5876]				
P-55	Louisiana certified copies of organizational documents of Imperial [Bates-Stamped HAR005896-5926]				
P-56	Louisiana certified copies of organizational documents of Harrison [Bates-Stamped HAR005877-5895]				
P-57	Invoices for A-Z Acct No. 95750/017501 5/4/15 through 9/28/15 [Bates-Stamped HAR005055-5267]				

P-58	Invoices for A-Z Acct No. 95751/017502 through 9/28/15 [Bates-Stamped HAR004517-4701]				
P-59	2016 AZ/Waco Invoices [Bates-Stamped HAR004702-5054]				
P-60	2016 AZ/Dallas Invoices [Bates-Stamped HAR005268-5688]				
P-61	5/31/19 Aged Trial Balance [Bates-Stamped HAR003917-4122]				
Demo.	Map of Texas/Louisiana				
Demo.	Harrison warehouse photo				
Demo.	Imperial warehouse photo				
Demo.	Brad Prendergast headshot				
Demo.	Wayne Baquet headshot				
Demo.	Sandy Zazulak headshot				
Demo.	Scott Faley headshot				
Demo.	Chris McClure headshot				
Demo.	Dan Burgos headshot				
Demo.	Harrison operations process diagram				
Demo.	Timeline of events				
Demo.	Slide deck for opening				
Demo.	Slide deck for closing				

Respectfully submitted,

/s/ Joseph A. Unis, Jr.

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**ATTORNEYS FOR PLAINTIFF  
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**CERTIFICATE OF SERVICE**

I certify that on March 19, 2021, I served this document on all counsel of record via the ECF system and/or email.

/s/ Joseph A. Unis, Jr